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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELANDIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD R. HILLS,
SARI ALQSOUS,
YAZAN B. AL-MADANI,
TARIQ SAYEGH

Defendants.

CASE NO.:

JUDGE

INDEX TO INDICTMENT

1:16 CR 329

JUDGE LIOI

INDEX TO INDICTMENT

DEFENDANT	COUNTS	VIOLATIONS	DESCRIPTION/PENALTY
HILLS, Edward	1	18 U.S.C. § 1962(d)	Racketeering in Corrupt Organizations, Conspiracy 20 yrs./\$250,000 fine/3 yrs. SRV \$100 SA
	2	18 U.S.C. § 1951(a)	Conspiracy to Commit Hobbs Act Bribery 20 yrs./\$250,000 fine/3 yrs. SRV \$100 SA
	8, 28	18 U.S.C. § 1349	Conspiracy to Commit Honest Services and Money and Property Mail and Wire Fraud 20 yrs./\$250,000 fine/3 yrs. SRV \$200 SA
	9-12	18 U.S.C. § 1341	Money and Property Mail Fraud 20 yrs./\$250,000 fine/3 yrs. SRV \$400 SA
	13	18 U.S.C. § 371	Conspiracy to Solicit, Receive, Offer and Pay Health Care Kickbacks 5 yrs./\$250,000 fine/3 yrs. SRV \$100 SA
	14-20	42 U.S.C. § 1320a-7b(b)(1)(A)	Receipt of Kickbacks in Connection with a Federal Health Care Program 5 yrs./\$25,000 fine/3 yrs. SRV \$700 SA

	29	18 U.S.C. § 1512(k)	Conspiracy to Obstruct Justice and Tamper With Witnesses 20 yrs./\$250,000 fine/3 yrs. SRV \$100 SA
	31-33	26 U.S.C. § 7206(1)	False Statements on Tax Returns 3 yrs./\$100,000 fine/ 3yrs. SRV
ALQSOUS, Sari	1	18 U.S.C. § 1962(d)	Racketeering in Corrupt Organizations, Conspiracy 20 yrs./\$250,000 fine/3 yrs. SVR \$100 SA
	2	18 U.S.C. § 1951(a)	Conspiracy to Commit Hobbs Act Bribery 20 yrs./\$250,000 fine/3 yrs. SRV \$100 SA
	3, 13	18 U.S.C. § 371	Conspiracy to Commit Bribery; Solicit, Receive, Offer and Pay Health Care Kickbacks 5 yrs./\$250,000 fine/3 yrs. SRV \$200 SA
	4, 8, 28	18 U.S.C. § 1349	Conspiracy to Commit Honest Services and Money and Property Mail and Wire Fraud 20 yrs./\$250,000 fine/3 yrs. SRV \$300 SA
	5-7	18 U.S.C. § 666	Bribery in Relation to Federally Funded Program 10 yrs./\$250,000 fine/3 yrs. SRV \$300 SA
	9-12	18 U.S.C. § 1341	Money and Property Mail Fraud 20 yrs./\$250,000 fine/3 yrs. SRV \$400 SA
	21-27	42 U.S.C. § 1320a-7b(b)(2)(A)	Offering or Paying Kickbacks in Connection with Federal Health Care Program 5 yrs./\$25,000 fine/3 yrs. SRV \$700 SA
	29	18 U.S.C. § 1512(k)	Conspiracy to Obstruct Justice and Tamper With Witnesses 20 yrs./\$250,000 fine/3 yrs. SRV \$100 SA
AL-MADANI, Yazan	1	18 U.S.C. § 1962(d)	Racketeering in Corrupt Organizations, Conspiracy 20 yrs./\$250,000 fine/3 yrs. SVR \$100 SA
	2	18 U.S.C. § 1951(a)	Conspiracy to Commit Hobbs Act Bribery 20 yrs./\$250,000 fine/3 yrs. SRV \$100 SA
	3, 13	18 U.S.C. § 371	Conspiracy to Commit Bribery; Solicit, Receive, Offer and Pay Health Care Kickbacks 5 yrs./\$250,000 fine/3 yrs. SRV \$200 SA
	4, 8, 28	18 U.S.C. § 1349	Conspiracy to Commit Honest Services and Money

			and Property Mail and Wire Fraud 20 yrs./\$250,000 fine/3 yrs. SRV \$300 SA
	6-7	18 U.S.C. § 666	Bribery in Relation to Federally Funded Program 10 yrs./\$250,000 fine/3 yrs. SRV \$200 SA
	9-12	18 U.S.C. § 1341	Money and Property Mail Fraud 20 yrs./\$250,000 fine/3 yrs. SRV \$400 SA
	21-27	42 U.S.C. § 1320a-7b(b)(2)(A)	Offering or Paying Kickbacks in Connection with Federal Health Care Program 5 yrs./\$25,000 fine/3 yrs. SRV \$700 SA
	29	18 U.S.C. § 1512(k)	Conspiracy to Obstruct Justice and Tamper With Witnesses 20 yrs./\$250,000 fine/3 yrs. SRV \$100 SA
	30	18 U.S.C. § 1001	False Statements or Representation 5 yrs./\$250,000/3 yrs. SRV
SAYEGH, Tariq	3	18 U.S.C. § 371	Conspiracy to Commit Bribery
	4	18 U.S.C. § 1349	Conspiracy to Commit Honest Services Mail and Wire Fraud 20 yrs./\$250,000 fine/3 yrs. SRV \$100 SA
	5-7	18 U.S.C. § 666	Bribery in Relation to Federally Funded Program 10 yrs./\$250,000 fine/3 yrs. SRV \$300 SA

Respectfully submitted,

CAROLE S. RENDON
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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of October 2016 a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Om M. Kakani

Om M. Kakani

Assistant U.S. Attorney